



**U.S. Department of Justice**  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, DC 20005

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March 25, 2022

**VIA ECF**

The Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Make the Road New York, et al. v. U.S. Dep't of Homeland Security, et al.*,  
No. 1:18-cv-2445-NGG-TAM (EDNY)

Dear Judge Garaufis:

Per Defendants' proposal in their Letter Brief of March 4, 2022, ECF 87, Defendants respectfully submit the attached updated Vaughn indices and declarations pertaining to the sample of documents submitted for *in camera* review, in light of the Second Circuit's decision in *Nat. Res. Def. Council v. United States Env't Prot. Agency*, 19 F.4th 177 (2d Cir. 2021). A redline showing changes to Defendants' Vaughn entries compared to the previously filed updated joint table, *see* ECF 82-1, is also attached.

Defendants appreciate the Court's ongoing consideration of this matter.

Dated: March 25, 2022

Sincerely,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

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Assistant Branch Director

/s/ Cormac Early  
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